

2:28 pm, Jan 05 2021

1:21-mj-15 to -16 TMD

AT BALTIMORE

CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

BY \_\_\_\_\_ Deputy

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

Your Affiant, Daniel Bedard, being duly sworn, deposes and states the following:

1. I am a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), presently assigned to the Criminal Prosecutions Unit in Baltimore, Maryland. I have been so employed with ICE / ERO since May 2019. I am a graduate of the Basic Immigration Enforcement Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. As part of my daily duties as an ERO Deportation Officer, I investigate administrative and criminal violations pertaining to U.S. Immigration law, including illegal re-entry after deportation in violation of Title 8 U.S.C. §§ 1326(a). As an ERO Deportation Officer, I am charged with the duty of enforcing the immigration, customs, and other federal statutes, such as, but not limited to the offenses described below and other duties imposed by law by the Attorney General of the United States and the Secretary of Homeland Security.

**PURPOSE OF THE AFFIDAVIT**

2. The purpose of this affidavit is to show probable cause that the defendants, Alexander JUAREZ-SANCHEZ (AKA: Jose Manuel FLORES), and Domingo RAMIREZ-ROBLERO have knowingly and intentionally violated 8 U.S.C. §1326(a) Reentry After Deportation (Removal).

**SOURCES OF INFORMATION**

3. I make the statements in this Affidavit, in part, based on my personal knowledge gathered during my participation in this investigation, on information and reports provided by the Maryland State Police and from documents located in the defendants' alien files. I have not set

forth every fact learned during the course of the investigation, nor do I request this Court rely upon any facts not set forth herein in reviewing this application.

**PROBABLE CAUSE**

4. JUAREZ-SANCHEZ is a citizen and national of Mexico who entered the United States without inspection at an unknown place, and at an unknown time before 2014.

5. On or around November 13, 2014 JUAREZ-SANCHEZ was taken into ICE custody and served with a Notice to Appear (“NTA”) following his imprisonment in Indiana after a conviction for domestic violence that he sustained on May 31, 2014. On or about January 27, 2015, an Immigration Judge in Indianapolis, Indiana issued JUAREZ-SANCHEZ an order to voluntarily depart the United States to Mexico. On February 10, 2015, JUAREZ-SANCHEZ departed the United States for Mexico. He subsequently re-entered the United States at an unknown location and date.

6. On or about May 16, 2016 JUAREZ-SANCHEZ was taken into ICE custody and served with another Notice to Appear (“NTA”). On or about April 5, 2016, an Immigration Judge in Indianapolis, Indiana issued JUAREZ-SANCHEZ a stipulated final order of removal to Mexico. On or about May 3, 2016, JUAREZ-SANCHEZ was removed to Mexico by a chartered flight out of El Paso, Texas.

7. On or about July 28<sup>th</sup>, 2018 JUAREZ-SANCHEZ was arrested by the United States Border Patrol while attempting to re-enter the United States. He admitted to being a citizen of Mexico who did not have proper immigration documents to enter the United States. JUAREZ-SANCHEZ was charged with Illegal entry by an alien in violation of 8 U.S.C. §1325. On or about July 30, 2018, JUAREZ-SANCHEZ was convicted on this charge in the U.S.

District court for the Southern District of Texas. On or about August 1, 2018, JUAREZ-SANCHEZ was removed to Mexico on foot from Laredo, Texas.

8. On or about May 16, 2019, JUAREZ-SANCHEZ was arrested by United States Border Patrol officers in Texas after he illegally reentered the United States. JUAREZ-SANCHEZ admitted to being a citizen of Mexico and that he had previously been deported from the United States. On or about May 17, 2019, JUAREZ-SANCHEZ was removed to Mexico on foot at the Hidalgo, Texas port of entry. He subsequently re-entered the United States at an unknown place and date.

9. On or about July 31, 2012 RAMEREZ-ROBLERO was arrested by United States Border Patrol in Arizona. On July 31, 2012 RAMEREZ-ROBLERO was issued an Expedited Order of removal. RAMEREZ-ROBLERO departed the United States for Mexico on July 31, 2012 from Douglas, Arizona on foot.

10. On or about April 27, 2014 RAMIREZ-ROBLERO was arrested by United States Border Patrol in Texas after he illegally reentered the United States. RAMIREZ-ROBLERO admitted to being a citizen of Mexico and that he had previously been deported from the United States. On or About April 27, 2014 RAMIREZ-ROBLERO departed the United States for Mexico on foot from Laredo, Texas. He subsequently re-entered the United States at an unknown place and date.

11. On August 5, 2020, JUAREZ-SANCHEZ and RAMIREZ-ROBLERO were arrested near Hagerstown, Maryland, by officers of the Maryland State Police (MSP). After a traffic stop where RAMIREZ-ROBLERO was following another vehicle too closely on I-81 while driving a rented Honda Accord with Indiana license plates, MSP Master Trooper Craig Miller became suspicious when RAMIREZ-ROBLERO could provide no identification, could

not identify the passenger (JUAREZ-SANCHEZ), and fumbled through questions about where they were going. Trooper Miller requested a K9 unit, and after the dog alerted for drugs, a search of the vehicle yielded approximately \$47,000 in cash, what was later confirmed by laboratory analysis to be just under 2 kg of fentanyl and 1 kg of heroin, along with other indicia of drug smuggling. Both RAMIREZ-ROBLERO and JUAREZ-SANCHEZ initially provided false names, however, their fingerprints and photographs match those taken while the men had previously been in United States Border Patrol or ICE custody.

12. There is no record that JUAREZ-SANCHEZ or RAMIREZ- ROBLERO ever obtained permission to reenter the United States from the Secretary for Homeland Security or the United States Attorney General.

**CONCLUSION**

Based on the above mentioned information, I respectfully submit that probable cause exists to believe that on or about November 4, 2020, JUAREZ-SANCHEZ and RAMIREZ-ROBLERO, aliens who previously had been deported and removed, knowingly entered and were found in the United States without having obtained the express consent of the Attorney General of the United States or his successor, the Secretary for Homeland Security, to reapply for admission into the United States as required by law, in violation of 8 U.S.C. § 1326(a).



Deportation Officer Daniel Bedard  
Department of Homeland Security

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 this 5 day of January 2021.



Honorable Thomas DiGirolamo  
United States Magistrate Judge